

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,)
)
Plaintiff,) Cr. No. 20-01219 JB
)
vs.)
)
BLAINE MORGAN,)
)
Defendant.)

**UNITED STATES' MOTION FOR DOWNWARD ADJUSTMENT
IN DEFENDANT'S OFFENSE LEVEL**

The United States of America respectfully files this motion pursuant to U.S.S.G. § 3E1.1(b), and moves the Court for an order for a one (1) level downward adjustment of the offense level in sentencing the above-named defendant. As grounds therefore, the United States provides as follows:

1. Pursuant to U.S.S.G. § 3E1.1(a), the defendant clearly has demonstrated acceptance of responsibility for this offense, and the defendant's offense level should be decreased by two (2) levels.
2. Prior to operation of U.S.S.G. § 3E1.1(b), the defendant's offense level is 16 or greater.
3. The defendant has assisted authorities in the investigation or prosecution of this matter by timely notifying authorities of the defendant's intention to enter a plea of guilty, thereby permitting the government to avoid preparing for trial and permitting the government and the Court to allocate their resources efficiently.
4. Therefore, pursuant to U.S.S.G. § 3E1.1(b), the defendant's offense level should be adjusted downward by one (1) additional level.

WHEREFORE, the United States respectfully requests a downward adjustment in defendant's offense level of one (1) additional level for acceptance of responsibility.

Respectfully submitted,

FRED J. FEDERICI
Acting United States Attorney

/s/
JENNIFER M. ROZZONI
Assistant U. S. Attorney
P.O. Box 607
Albuquerque, New Mexico
(505) 346-7274

I HEREBY CERTIFY that on September 24, 2021, I filed the foregoing pleading electronically through the CM/ECF system, which caused the parties or counsel of record to be served by electronic means, as reflected on the Notice of Electronic Filing.

/s/
JENNIFER M. ROZZONI
Assistant United States Attorney